

HEARING DATE AND TIME: April 8, 2015 at 10:00 a.m. (Eastern Time)
OBJECTION DEADLINE: March 30, 2014 at 4:00 p.m. (Eastern Time)

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*Attorneys for the International Bank for Reconstruction and Development as trustee of the
Retired Staff Benefits Plan and Trust*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**JOINDER OF THE INTERNATIONAL BANK FOR RECONSTRUCTION AND
DEVELOPMENT AS TRUSTEE OF THE RETIRED STAFF BENEFITS PLAN AND
TRUST TO THE OBJECTION OF CITADEL ENERGY INVESTMENTS LTD. AND
CITADEL EQUITY FUND LTD. TO THE MOTION TO ALLOW DISCLOSURE OF
THE DERIVATIVE QUESTIONNAIRES PURSUANT TO SECTION 107(a) OF THE
BANKRUPTCY CODE**

The International Bank for Reconstruction and Development as trustee of the Retired Staff Benefits Plan and Trust, by and through its undersigned counsel, hereby joins in the objections of Citadel Energy Investments Ltd. and Citadel Equity Fund Ltd. (the “Citadel Objection to the Motion”) filed to the Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code (the “Motion”), as follows:

OBJECTION AND JOINDER

The International Bank for Reconstruction and Development as trustee of the Retired Staff Benefits Plan and Trust and the Debtors were parties to certain derivative contracts.

1. The International Bank for Reconstruction and Development as trustee of the Retired Staff Benefits Plan and Trust hereby joins and incorporates by reference the arguments, in their entirety, made by Citadel Energy Investments Ltd. and Citadel Equity Master Fund Ltd. in the Citadel Objection to the Motion [Docket 49030].

WHEREFORE, for the foregoing reasons, the International Bank for Reconstruction and Development as trustee of the Retired Staff Benefits Plan and Trust respectfully requests that this Court deny the Debtors' Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code, and, alternatively, if the Court grants the Motion, direct Debtors to redact all identifying, confidential and proprietary information from any documents disclosed, including any negotiated agreement such as any ISDA Master Agreements and any Guarantees, and grant such other, further or different relief as this Court deems just and proper.

Dated: New York, New York
March 30, 2015

SCHLAM STONE & DOLAN LLP

By: s/ Bennette D. Kramer

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